

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	
EMELIKE NWOSUOCHA,	:	
	:	
Plaintiff,	:	1:21-cv-04047 (VM)
	:	
v.	:	
	:	
DONALD MCKINLEY GLOVER, II, et al.	:	
	:	
Defendants.	:	
	:	
	X	

**STIPULATION TO FURTHER EXTEND DEFENDANTS’ TIME TO
ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT**

WHEREAS, on May 6, 2021, Plaintiff Emelike Nwosuocha filed his Complaint (the “Complaint”) in the above-captioned action;

WHEREAS, Plaintiff has properly effected service of the Summons and Complaint upon Donald McKinley Glover, II, Ludwig Emil Tomas Göransson, Kobalt Music Publishing America, Inc. d/b/a Songs of Kobalt Music Publishing, RCA Records, Sony Music Entertainment, and Young Stoner Life Publishing, LLC, Theory Entertainment LLC d/b/a 300 Entertainment, Atlantic Recording Corporation, Roc Nation Publishing LLC d/b/a Songs of Roc Nation, Songs of Universal, Inc., Warner Music Group Corp., and Warner-Tamerlane Publishing Corp. (collectively, the “Served Defendants”);

WHEREAS, Jeffery Lamar Williams (“Williams”) hereby accepts service of process of the Summons and Complaint;

WHEREAS, Williams has agreed to accept service of process in exchange for Plaintiff's agreement to extend for each named defendant the time in which to answer, move, or otherwise respond to the Complaint;

WHEREAS, Plaintiff acknowledges that he will save considerable time and expense by entering into this stipulation; and

WHEREAS, the parties to this stipulation agree that establishing a single date to answer, move, or otherwise respond to the Complaint advances the interests of judicial economy and saves the parties time and expense;

NOW, THEREFORE, Plaintiff and the Served Defendants, along with Williams (collectively, "Defendants"), by and through their undersigned counsel or agents, hereby stipulate as follows:

1. Defendants shall answer, move, or otherwise respond to the Complaint on or before Wednesday, December 22, 2021.
2. Defendants preserve all of their respective challenges, defenses, and responses to the Complaint, except they shall not raise the defense of improper service of process.
3. This stipulation may be signed in counterparts, and any facsimile/PDF/electronic signatures shall be deemed original signatures.

Dated: November 17, 2021
New York, New York

AIDALA BERTUNA & KAMINS PC.

By: /s/ Imran H. Ansari
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*For purposes of this stipulation only,
Attorneys for Defendants Jeffery Lamar
Williams, Young Stoner Life Publishing, LLC,
Atlantic Recording Corporation, Warner-
Tamerlane Publishing Corp., Warner Music
Group Corp., Kobalt Music Publishing
America, Inc., d/b/a Songs of Kobalt Music
Publishing, RCA Records, Sony Music
Entertainment, Young Stoner Life Publishing,
LLC, Theory Entertainment LLC d/b/a 300
Entertainment, and Songs of Universal, Inc.*

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By: /s/ Allen Grodsky
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*As authorized signatory for purposes of this
stipulation o/b/o Defendant Ludwig Emil
Tomas Göransson*

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*Attorneys for Defendant Roc Nation
 Publishing LLC d/b/a Songs of Roc Nation*

SO ORDERED:

The Honorable Victor Marrero
United States District Court Judge